

Attorneys for Defendants/Debtors-in-Possession  
GGW DIRECT, LLC, GGW BRANDS, LLC  
and GGW EVENTS, LLC

## DISTRICT OF NEVADA

WYNN LAS VEGAS LLC d/b/a  
WYNN LAS VEGAS, a Nevada  
limited liability company

Plaintiff,

VS.

GGW DIRECT, LLC, a Delaware limited liability company; GGW BRANDS, LLC, a Delaware limited liability company; GGW EVENTS, LLC, a Delaware limited liability company; MANTRA FILMS, INC., a suspended Oklahoma corporation; BLUE HORSE TRADING, LLC, a California limited liability company; PEPE BUS, LLC, an inactive Montana limited liability company; SANDS MEDIA, INC., a revoked Nevada domestic corporation; JOSEPH R. FRANCIS, an individual; DAVID R. HOUSTON, an individual; and DAVID R. HOUSTON, LTD., a Nevada professional corporation, doing business as THE LAW OFFICE OF DAVID R. HOUSTON,

Defendants.

) Case No.:

NOTICE OF REMOVAL

Defendants/Debtors-in-Possession GGW Direct, LLC, GGW Brands, LLC and GGW Events, LLC ("Debtors") hereby give notice of removal of the entire civil action captioned *Wynn Las Vegas LLC d/b/a Wynn Las Vegas vs. GGW Direct, LLC, et al.*, case number A-12-660288-B (the "Nevada State Court Action"), from the Eighth Judicial District Court, Clark County, Nevada (the "Nevada State Court"), to the United States Bankruptcy Court for the District of Nevada. Debtors file this notice pursuant to 28 U.S.C. § 1452(a) and Fed. R. Bankr. P. 9027. A true and correct copy of the Register of Actions in the Nevada State Court Action is attached hereto as Exhibit "A."<sup>1</sup>

As grounds for removal of the Nevada State Court Action, Debtors state as follows:

1. Debtors are parties to the Nevada State Court Action.

2. On February 27, 2013, Debtors separately filed voluntary Chapter 11 petitions, which are each presently pending before the United States Bankruptcy Court for the Central District of California, Los Angeles Division. The Chapter 11 case number for GGW Direct, LLC is 2:13-bk-15132-SK. The Chapter 11 case number for GGW Brands, LLC is 2-13-bk-15130-SK. The Chapter 11 case number for GGW Events, LLC is 2-13-bk-15134-SK. (The Chapter 11 cases for GGW Direct, LLC, GGW Brands, LLC and GGW Events, LLC are collectively referred to herein as the "GGW Bankruptcy Cases".)

3. The Nevada State Court Action alleges causes of action for declaratory relief and injunction against Debtors in connection with a judgment obtained by Wynn Las Vegas, LLC d/b/a Wynn Las Vegas ("Wynn") against Joseph R. Francis ("Mr. Francis") in a separate lawsuit filed in June 2008 in the Eighth Judicial District Court in Clark County, Nevada, for breach of contract and related causes of action for Mr. Francis' alleged failure to pay money owed in connection with credit instruments executed in favor of Wynn. The Nevada State Court Action alleges that Mr. Francis is the alter ego of Debtors and was brought as a means to collect on the disputed judgment obtained in the prior lawsuit.

<sup>1</sup> The complete record of pleadings and documents filed in the Nevada State Court Action are voluminous and Debtors are in the process of compiling them. Debtors will file the complete record of the Nevada State Court Action pleadings with this Court within 30 days from the date of this filing, unless otherwise ordered by this Court.

1           4.       Once removal of the Nevada State Court Action to the United States Bankruptcy  
2 Court for the District of Nevada is accomplished, Debtors will seek to have the case transferred  
3 directly to the United States Bankruptcy Court for the Central District of California, Los  
4 Angeles Division. (The GGW Bankruptcy Cases are being presided over by Judge Sandra R.  
5 Klein in Courtroom 1575 of the United States Bankruptcy Court for the Central District of  
6 California, Los Angeles Division.)

7           5.       Removal of the Nevada State Court Action is proper because it arises in and  
8 relates to "core proceedings" over which the United States Bankruptcy Court for the Central  
9 District of California, Los Angeles Division, has jurisdiction under, *inter alia*, 28 U.S.C. §  
10 1334(b) and 28 U.S.C. § 157(b)(2)(A), (B), (C), (E), (G), (H), (I), (K) and (O).

11          6.       The Nevada State Court Action was commenced prior to the Petition Date for  
12 each Debtor, and this Notice of Removal is being filed within 30 days of the commencement of  
13 Debtors' separately filed voluntary Chapter 11 petitions.

14          7.       This Notice of Removal is being served on all parties to the Nevada State Court  
15 Action through their counsel of record.

16          8.       A true and correct copy of this Notice of Removal is being filed with the Clerk of  
17 the Eighth Judicial District Court, Clark County, Nevada.

18  
19 DATED: March 26, 2013

LAW OFFICES OF ROBERT M. YASPAN

20  
21 By: 

22 ROBERT M. YASPAN  
23 JOSEPH G. McCARTY  
24 JASON H. GOROWITZ  
25 Attorneys for Defendants/Debtors-in-Possession  
26 GGW DIRECT, LLC, GGW BRANDS,  
27 LLC and GGW EVENTS, LLC  
28

# **EXHIBIT A**

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Location : District Court Civil/Criminal [Help](#)**REGISTER OF ACTIONS**

CASE NO. A-12-660288-B

Wynn Las Vegas LLC, Plaintiff(s) vs. GGW Direct LLC, Defendant(s)

§  
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§  
§
 Case Type: **Business Court**  
 Subtype: **NRS Chapters 78-89**  
 Date Filed: **04/18/2012**  
 Location: **Department 11**  
 Conversion Case Number: **A660288**
**PARTY INFORMATION**

Defendant	Blue Horse Trading LLC	Lead Attorneys Elliot S. Blut Retained 702-384-1050(W)
Defendant	David R Houston Ltd <i>Doing Business</i> As Law Office of David R Houston	David R. Grundy Retained 7027866868(W)
Defendant	Francis, Joseph R	Andre Lagomarsino Retained 7023832864(W)
Defendant	GGW Brands LLC	David J. Otto Retained 702-419-1222(W)
Defendant	GGW Direct LLC	David J. Otto Retained 702-419-1222(W)
Defendant	GGW Events LLC	David J. Otto Retained 702-419-1222(W)
Defendant	Houston, David R	David R. Grundy Retained 7027866868(W)
Defendant	Mantra Films Inc	
Defendant	Pepe Bus LLC	
Defendant	Sands Media Inc	
Plaintiff	Wynn Las Vegas LLC <i>Doing Business</i> As Wynn Las Vegas	Mitchell J. Langberg Retained 702-382-2101(W)

**EVENTS & ORDERS OF THE COURT****OTHER EVENTS AND HEARINGS**

04/18/2012	<b>Motion</b> Plaintiff Wynn Las Vegas, LLC's Motion to Temporarily File Under Seal File Under Seal Pursuant to This Request
04/18/2012	<b>Declaration</b> Declaration of Mitchell J Langberg in Support of Issuance of Writ of Attachment, Writs of Garnishment, TRO and Preliminary Injunction Submitted Under Seal Pursuant to Pending Motion to Temporarily File Under Seal
04/18/2012	<b>Memorandum</b> Memorandum of Points and Authorities in Support of Plaintiffs 1) Ex Parte Application for Writ of Attachment and Writ of Garnishment Without Notice, and 2) Ex Parte Motion for Temporary Restraining Order and Preliminary Injunction on Order Shortening Time Submitted Under Seal Pursuant to Pending Motion to Temporarily File Under Seal

04/18/2012 **Application**  
*Ex Parte Application For Order Directing The Issuance of a Writ of Attachment and Writs of Garnishment Without Notice Submitted Under Seal Pursuant to Pending Motion to Temporarily File Under Seal*

04/18/2012 **Motion**  
*Ex Parte Motion for Temporary Restraining Order and Preliminary Injunction on Order Shortening Time Submitted Under Seal Pursuant to Pending Motion to Temporarily File Under Seal*

04/18/2012 **Minute Order** (3:59 PM) (Judicial Officer Gonzalez, Elizabeth)  
Minutes  
Result: Granted in Part

04/18/2012 **Complaint**  
Complaint

04/18/2012 **Initial Appearance Fee Disclosure**

04/19/2012 **Temporary Restraining Order**  
*Temporary Restraining Order and Order Setting Hearing on Motion for Preliminary Injunction.*

04/19/2012 **Notice of Posting Bond**  
*Notice of Posting Bond*

04/24/2012 **Affidavit**  
*Affidavit of Service of David R. Houston, LTD. dba The Law Office of David R. Houston*

04/24/2012 **Affidavit**  
*Affidavit of Service of David R. Houston*

04/24/2012 **Affidavit**  
*Affidavit of Service Joseph R. Francis*

04/24/2012 **Affidavit**  
*Affidavit of Service of Sands Media, Inc.*

04/24/2012 **Affidavit**  
*Affidavit of Reasonable Diligence and Proof of Service Summons & Complaint of Blue Horse Trading, LLC*

04/24/2012 **Affidavit**  
*Affidavit of Reasonable Diligence and Proof of Service Summons & Complaint of Mantra Films, Inc.*

04/24/2012 **Affidavit**  
*Affidavit of Service of GGW Events, LLC*

04/24/2012 **Affidavit**  
*Affidavit of GGW Direct, LLC*

04/24/2012 **Affidavit**  
*Affidavit of Service of GGW Brands, LLC*

04/26/2012 **Preliminary Injunction Hearing** (9:00 AM) (Judicial Officer Gonzalez, Elizabeth)

04/26/2012 **Preliminary Injunction Hearing** (9:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Temporary Restraining Order and Order Setting Hearing on Motion for Preliminary Injunction.*

04/26/2012 **All Pending Motions** (9:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
Parties Present  
Minutes  
Result: Matter Heard

05/09/2012 **Answer (Business Court)**  
*Answer of David R. Houston and David R. Houston, Ltd.*

05/09/2012 **Initial Appearance Fee Disclosure**  
*Initial Appearance Fee Disclosure*

05/10/2012 **Answer (Business Court)**  
*Defendants GGW Direct, LLC and GGW Brands, LLC's Answer to Complaint*

05/11/2012 **Initial Appearance Fee Disclosure**  
*Initial Appearance Fee Disclosure*

05/11/2012 **Consent to Service By Electronic Means**  
*Consent to Service by Electronic Means*

05/15/2012 **Business Court Order**  
*Business Court Order*

05/17/2012 **Substitution of Attorney**  
*Substitution of Attorneys*

05/22/2012 **CANCELED Motion for Temporary Restraining Order** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Vacated - per Judge*

05/25/2012 **CANCELED Motion** (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Vacated - per Judge*

05/30/2012 **Three Day Notice of Intent to Default**  
*Notice of Intent to Take Default Against Joseph R. Francis*

06/04/2012 **Answer (Business Court)**  
*Defendant Joseph R. Francis' Answer to Complaint*

06/04/2012 **Initial Appearance Fee Disclosure**  
*Initial Appearance Fee Disclosure (NRS Chapter 19)*

06/04/2012 **Answer (Business Court)**  
*Blue Horse Trading, LLC's Answer to Complaint*

06/04/2012 **Initial Appearance Fee Disclosure**  
*Initial Appearance Fee Disclosure (NRS Chapter 19)*

06/04/2012 **Answer (Business Court)**  
*GGW Events, LLC's Answer to Complaint*

06/04/2012 **Initial Appearance Fee Disclosure**  
*Initial Appearance Fee Disclosure (NRS Chapter 19)*

06/05/2012 **Motion for Sanctions**  
*Plaintiff's Motion For Issue Sanctions, Protective Order And To Compel Production Of Documents On Order Shortening Time*

06/06/2012 **Certificate of Service**  
*Certificate Of Service Of Plaintiff's Motion For Issue Sanctions, Protective Order And To Compel Production Of Documents On Order Shortening Time*

06/06/2012 **Receipt of Copy**  
*Receipt of Copy of Plaintiff's Motion for Issue Sanctions, Protective Order and to Compel Production of Documents on Order Shortening Time*

06/11/2012 **Commissioners Decision on Request for Exemption - Granted**  
*Commissioner's Decision on Request for Exemption*

06/19/2012 **Opposition to Motion**  
*GGW Direct, LLC and GGW Brands, LLC's Opposition to Motion for Issue Sanctions*

06/25/2012 **Motion**  
*Motion to Redact Court Records on Order Shortening Time*

06/25/2012 **Supplement**  
*GGW Direct, LLC and GGW Brands, LLC's Supplement Opposition to Motion for Issue Sanctions*

06/25/2012 **Motion**  
*Defendants' Motion to File Opposition to Preliminary Injunction Under Seal*

06/25/2012 **Reply in Support**  
*Plaintiff's Reply In Support Of Motion For Issue Sanctions, Protective Order And To Compel Production Of Documents On Order Shortening Time*

06/25/2012 **Receipt of Copy**  
*Receipt Of Copy Of Plaintiff's Reply In Support Of Motion For Issue Sanctions, Protective Order And To Compel Production Of Documents On Order Shortening Time*

06/26/2012 **Motion for Sanctions** (9:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Plaintiffs Motion For Issue Sanctions, Protective Order And To Compel Production Of Documents On Order Shortening Time*  
Parties Present  
Minutes  
 Result: Matter Heard

06/26/2012 **Filed Under Seal**  
*GGW Direct, LLC and GGW Brands, LLC'S Opposition to Preliminary Injunction*

06/26/2012 **Receipt of Copy**  
*Receipt of Copy of Plaintiff's Reply In Support Of Motion For Issue Sanctions, Protective Order And To Compel Production Of Documents On Order Shortening Time*

06/26/2012 **Receipt of Copy**  
*Receipt of Copy of Motion to Redact Court Records on Order Shortening Time*

06/27/2012 **Notice of Hearing**

06/27/2012 **Notice of Appearance**  
*Notice Of Appearance*

06/28/2012 **CANCELED Motion** (9:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Vacated - per Judge*  
*Motion to Redact Court Records on Order Shortening Time*

06/28/2012 **Joinder**  
*Defendant Joseph R. Francis' Notice Of Joinder To GGW Direct, LLC And GGW Brands, LLC's Opposition To Preliminary Injunction*

06/29/2012 **Telephonic Conference** (10:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
Parties Present  
Minutes  
 Result: Matter Heard

06/29/2012 **Stipulation and Order**  
*Stipulation and Proposed Order Regarding the Participation of David R. Houston, Esq. and David R. Houston, Ltd. in Further Proceedings*

07/02/2012 **Telephonic Conference** (1:30 PM) (Judicial Officer Gonzalez, Elizabeth)  
Parties Present  
Minutes  
 Result: Matter Continued

07/03/2012 **Telephonic Conference** (1:00 PM) (Judicial Officer Gonzalez, Elizabeth)  
Parties Present  
Minutes  
 Result: Matter Heard

07/03/2012 **Exhibits**  
*Redacted Exhibits to Mitchell J. Langberg in Support of Issuance of Writ of Attachment, Writs of Garnishment, TRO and Preliminary Injunction Filed on April 18, 2012*

07/03/2012 **Order Granting Motion**  
*Order Granting Motion to Redact Court Records*

07/05/2012 **Business Court Order**  
*Business Court Order*

07/06/2012 **Order Granting Motion**  
*Order Granting Motion to Redact Court Records*

07/10/2012 **Notice of Entry of Order**  
*Notice Of Entry Of Order Granting Motion To Redact Court Records*

07/10/2012 **Certificate of Mailing**  
*Certificate Of Service Of Redacted Exhibits To Declaration Of Mitchell J. Langberg In Support Of Issuance Of Writ Of Attachment, Writs Of Garnishment, TRO And Preliminary Injunction Filed On April 18, 2012*

07/10/2012 **Stipulation and Order**  
*Stipulation and Order*

07/11/2012 **Notice of Entry of Stipulation and Order**  
*Notice of Entry of Stipulation and Order*

07/12/2012 **Notice of Entry of Stipulation and Order**  
*Notice of Entry of Stipulation and Order*



07/16/2012 **Filed Under Seal**  
*Wynn Las Vegas, LLC'S Exhibits In Support Of Reply In Support Of Preliminary Injunction Filed Under Seal Pursuant To Stipulation And Protective Order Filed July 10, 2012*

07/16/2012 **Filed Under Seal**  
*Wynn Las Vegas, LLC'S Reply In Support Of Preliminary Injunction Filed Under Seal Pursuant To Stipulation And Protective Order FFiled July 10, 2012*

07/16/2012 **Order**  
*Order Regarding the Participation of David R. Houston, Esq. and David R. Houston, Ltd. in Further Proceedings*

07/16/2012 **Reply**  
*Wynn Las Vegas, LLC's Reply in Support of Preliminary Injunction*

07/16/2012 **Certificate of Mailing**  
*Certificate Of Service Of Wynn Las Vegas, Llc's Reply In Support Of Preliminary Injunction And Wynn Las Vegas, Llc's Exhibits In Support Of Reply In Support Of Preliminary Injunction*

07/16/2012 **Exhibits**  
*Wynn Las Vegas, LLC's Exhibits in Support of Reply in Support of Preliminary Injunction*

07/17/2012 **Receipt of Copy**  
*Receipt Of Copy Wynn Las Vegas, LLC's Reply In Support Of Preliminary Injunction And Wynn Las Vegas, LLC's Exhibits In Support Of Reply In Support Of Preliminary Injunction*

07/17/2012 **Receipt of Copy**  
*Receipt Of Copy Wynn Las Vegas, LLC's Reply In Support Of Preliminary Injunction And Wynn Las Vegas, LLC's Exhibits In Support Of Reply In Support Of Preliminary Injunction*

07/17/2012 **Notice of Entry of Order**  
*Notice of Entry of Order*

07/18/2012 **Motion**  
*Defendants' Motion to File Reply to Opposition to Motion for Preliminary Injunction Under Seal*

07/19/2012 **Motion**  
*Defendants' Motion to File Sur Reply to Reply to Opposition to Motion for Preliminary Injunction Under Seal*

07/19/2012 **Objection**  
*Plaintiff's Objections To Defendants' Evidence*

07/19/2012 **Filed Under Seal**  
*GGW Direct, LLC And GGW Brands, LLC's Sur Reply To Reply To Opposition To Motion For Preliminary Injunction Filed Under Seal*

07/20/2012 **Preliminary Injunction Hearing (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)**  
*07/06/2012 Reset by Court to 07/06/2012*  
*07/06/2012 Reset by Court to 07/20/2012*

07/20/2012 **Mandatory Rule 16 Conference (9:00 AM) (Judicial Officer Gonzalez, Elizabeth)**  
Parties Present  
Minutes  
*07/06/2012 Reset by Court to 07/20/2012*  
Result: Matter Heard

07/26/2012 **Transcript of Proceedings**  
*Transcript Of Proceedings Hearing On Motions And Mandatory Rule 16 Conference July 20, 2012*

08/02/2012 **Business Court Order**  
*Business Court Scheduling Order and Order Setting Civil Bench Trial and Calendar Call*

08/10/2012 **Motion (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)**  
**08/10/2012, 08/24/2012, 09/07/2012, 09/21/2012**  
*Defendants' Motion to File Opposition to Preliminary Injunction Under Seal*  
Minutes  
*07/31/2012 Reset by Court to 08/10/2012*  
Result: Matter Continued

08/17/2012 **Injunction**  
*Preliminary Injunction*

08/20/2012 **Arbitration File**

08/20/2012 **Motion to Compel**  
*Plaintiff's Motion To Compel Responses To Requests For Production Of Documents*

08/20/2012 **Notice of Entry**  
*Notice Of Entry Of Preliminary Injunction*

08/24/2012 **Motion to Seal/Redact Records (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)**  
**08/24/2012, 09/07/2012, 09/21/2012**  
*Defendants' Motion to File Sur Reply to Reply to Opposition to Motion for Preliminary Injunction Under Seal*

08/24/2012 **Motion (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)**  
**08/24/2012, 09/07/2012, 09/21/2012**  
*Defendants' Motion to File Reply to Opposition to Motion for Preliminary Injunction Under Seal*

08/24/2012 **All Pending Motions (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)**  
Minutes  
Result: Matter Continued

09/05/2012 **Motion to Quash**  
*Defendant Joseph Francis' Notice Of Motion and Motion To Quash Subpoena For Production Of Business Records Directed To Marks & Devine CPAs*

09/06/2012 **Joinder To Motion**  
*GGW Direct, LLC, GGW Brands, LLC, GGW Events, LLC, and Blue Horse Trading, LLC's Joinder to Defendant Joseph Francis' Notice of Motion and Motion to Quash Subpoena for Production of Business Records Directed to Marks & Devine, CPAs*

09/07/2012 **Filed Under Seal**  
*Defendant Joseph Francis' Motion for Reconsideration of the Court's Order Granting Plaintiff's Motion for Preliminary Injunction or, In the Alternative, Motion for Stay Pending Appeal Pursuant to NRCP Rule 62*



09/07/2012 **All Pending Motions** (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
Minutes  
 Result: Matter Continued

09/07/2012 **Opposition to Motion to Compel**  
*GGW Direct, LLC and GGW Brands, LLC's Opposition to Motion to Compel*

09/11/2012 **Order Shortening Time**  
*Defendant Joseph Francis' Motion For Hearing On Order Shortening Time Of Defendant Joseph Francis' Motion For Reconsideration Of The Court's Order Granting Plaintiff's Motion For Preliminary Injunction Or, In The Alternative, Motion For Stay Pending Appeal Pursuant To NRCP Rule 62 On Order Shortening Time*

09/11/2012 **Supplement**  
*Defendants' Supplement to Motion to File Opposition to Preliminary Injunction, Reply in Support of Preliminary Injunction and Sur Reply to Reply to Opposition to Motion for Preliminary Injunction Under Seal*

09/13/2012 **Filed Under Seal**  
*Pages 7-8 And Exhibit 3 To Plaintiff's Reply In Support Of Motion To Compel Redacted Pursuant To Striplation And Order Filed July 10, 2012*

09/13/2012 **Reply**  
*Plaintiff's Reply in Support of Motion to Compel*

09/18/2012 **Motion**  
*Motion to be Relieved as Counsel*

09/18/2012 **Notice of Hearing**  
*Notice of Hearing on Motion to be Relieved as Counsel*

09/20/2012 **Motion to Compel** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Plaintiff's Motion To Compel Responses To Requests For Production Of Documents*  
Parties Present  
Minutes  
 Result: Granted

09/21/2012 **All Pending Motions** (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
Minutes  
 Result: Granted

09/25/2012 **Motion to Withdraw as Counsel** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Elliot S. Blut, Esq.'s Motion to be Relieved as Counsel*  
Parties Present  
Minutes  
 Result: Granted

09/25/2012 **Opposition to Motion**  
*Opposition To Defendant Joseph Francis' Motion For Reconsideration The Court's Order Granting Plaintiff's Motion For Preliminary Injunction Or, In The Alternative, Motion For Stay Pending Appeal Pursuant To Nrcp 62*

09/26/2012 **Receipt of Copy**  
*Receipt Of Copy Opposition To Defendant Joseph Francis' Motion For Reconsideration The Court's Order Granting Plaintiff's Motion For Preliminary Injunction Or, In The Alternative, Motion For Stay Pending Appeal Pursuant To Nrcp 62*

09/26/2012 **Receipt of Copy**  
*Receipt Of Copy Opposition To Defendant Joseph Francis' Motion For Reconsideration The Court's Order Granting Plaintiff's Motion For Preliminary Injunction Or, In The Alternative, Motion For Stay Pending Appeal Pursuant To Nrcp 62*

09/26/2012 **Reply to Opposition**  
*Defendant Joseph Francis' Reply to Plaintiff's Opposition to Defendant Joseph R. Francis' Motion for Reconsideration of the Court's Order Granting Plaintiff's Motion for Preliminary Injunction or, in the Alternative, Motion for Stay Pending Appeal Pursuant to NRCP Rule 62*

09/27/2012 **Motion For Reconsideration** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Defendant Joseph Francis' Motion For Hearing On Order Shortening Time Of Defendant Joseph Francis' Motion For Reconsideration Of The Court's Order Granting Plaintiff's Motion For Preliminary Injunction Or, In The Alternative, Motion For Stay Pending Appeal Pursuant To NRCP Rule 62 On Order Shortening Time*  
Parties Present  
Minutes  
 Result: Denied

09/27/2012 **Opposition to Motion**  
*Plaintiff's Opposition To Defendant Joseph Francis' Motion To Quash Subpoena For Production Of Business Records Directed To Marks & Devine CPas*

09/27/2012 **Order Granting Motion**  
*Order Granting Plaintiff's Motion to Compel Responses to Requests for Production of Documents*

09/28/2012 **Notice of Entry of Order**  
*Notice Of Entry Of Order Granting Motion To Compel Responses To Requests For Production Of Documents*

09/28/2012 **Receipt of Copy**  
*Receipt Of Copy Of Plaintiff's Opposition To Defendant Joseph Francis' Motion To Quash Subpoena For Production Of Business Records Directed To Marks & Devine CPas*

09/28/2012 **Receipt of Copy**  
*Receipt Of Copy Of Plaintiff's Opposition To Defendant Joseph Francis' Motion To Quash Subpoena For Production Of Business Records Directed To Marks & Devine CPas*

10/02/2012 **Reply to Motion**  
*Defendant Joseph Francis's Reply To Plaintiff's Opposition To Defendant Joseph Francis's Motion To Quash Subpoena For Production Of Business Records Directed To Marks & Devine CPAs*

10/04/2012 **Status Check** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Status Check: Certification*  
Parties Present  
Minutes  
 Result: Matter Resolved

10/09/2012 **Motion to Quash** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Defendant Joseph Francis' Notice Of Motion and Motion To Quash Subpoena For Production Of Business Records Directed To Marks & Devine CPAs*

10/09/2012 **Joinder** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*GGW Direct, LLC, GGW Brands, LLC, GGW Events, LLC, and Blue Horse Trading, LLC's Joinder to Defendant Joseph Francis' Notice of Motion and Motion to Quash Subpoena for Production of Business Records Directed to Marks & Devine, CPAs*

10/09/2012 **All Pending Motions** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
Parties Present  
Minutes  
 Result: Denied

10/12/2012 **Order Granting Motion**  
*Order Granting Motion to be Relieved as Counsel*

10/15/2012 **Notice of Entry of Order**  
*Notice of Entry of Order Granting Motion to be Relieved as Counsel*

10/16/2012 **Transcript of Proceedings**  
*Transcript Of Proceedings Hearing On Motions September 20, 2012*

10/16/2012 **Transcript of Proceedings**  
*Transcript Of Proceedings Hearing On Plaintiff's Motion For Sanctions June 26, 2012*

10/24/2012 **Notice**  
*Notice of Claim of Lien*

10/25/2012 **Motion to Adjudicate Attorney's Lien**  
*Motion to Adjudicate the Rights of Counsel to Enforce Attorney's Lien and for Judgment for Attorney's Fees*

10/29/2012 **Order Denying Motion**  
*Order Denying Defendant Joseph Francis' Motion Quash Subpoena for Production of Business Records Directed to Marks & Devine CPAs*

10/30/2012 **Notice of Entry of Order**  
*Notice of Entry of Order Denying Defendant Joseph Francis' Motion to Quash Subpoena for Production of Business Records Directed to Marks & Devine CPAs*

11/15/2012 **Filed Under Seal**  
*Exhibit 5-10 11-12-22 24-25 27 31-33-34 and 38 to Plaintiff's Motion for Summary on it's first Claim For Declaratory Relief Un-redacted and/or Under Seal and Page 10 of Motion Filed Pursuant to July 10 2012 Stipulated Protective Order and Motion to Redact and File Under Seal Exhibits to Plaintiff's Motion for Summary Judgment on its First Claim for Declaratory Relief Filed November 15 2012*

11/15/2012 **Motion for Summary Judgment**  
*Plaintiff's Motion For Summary Judgment On Its First Claim For Declaratory Relief [Redacted, With Certain Exhibits Redacted and/or Filed Under Seal Pursuant to Motion Filed Concurrently Herewith and Stipulated Protective Order Dated July 10, 2012]*

11/15/2012 **Motion to Seal/Redact Records**  
*Motion to Redact and File Under Seal Exhibits to and Portions of Plaintiff's Motion for Summary Judgment on tis First Claim For Declaratory Relief*

11/20/2012 **Certificate of Mailing**  
*Certificate of Mailing of Motion to Adjudicate the Rights of Counsel to Enforce Attorney's Lien and For Judgment for Attorney's Fees*

11/20/2012 **Notice of Hearing**  
*Notice of Hearing on Motion to Adjudicate the Rights of Counsel to Enforce Attorney's Lien and For Judgment for Attorney's Fees*

11/30/2012 **Motion** (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Motion to Adjudicate the Rights of Counsel to Enforce Attorney's Lien and for Judgment for Attorney's Fees*  
Minutes  
 Result: Denied Without Prejudice

12/04/2012 **Removal to the US District Court**  
*Notice of Removal*

12/07/2012 **Order to Statistically Close Case**  
*Civil Order to Statistically Close Case*

12/13/2012 **Request**  
*Request For Immediate Resetting of Hearing*

12/17/2012 **Order Scheduling Status Check**  
*Order Scheduling Status Check*

12/18/2012 **CANCELED Motion for Summary Judgment** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Vacated - Case Closed*  
*Plaintiff's Motion For Summary Judgment On Its First Claim For Declaratory Relief [Redacted, With Certain Exhibits Redacted and/or Filed Under Seal Pursuant to Motion Filed Concurrently Herewith and Stipulated Protective Order Dated July 10, 2012]*

12/20/2012 **Status Check** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
Parties Present  
Minutes  
 Result: Matter Heard

12/21/2012 **CANCELED Motion to Seal/Redact Records** (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Vacated - Case Closed*  
*Motion to Redact and File Under Seal Exhibits to and Portions of Plaintiff's Motion for Summary Judgment on tis First Claim For Declaratory Relief*

12/21/2012 **Motion to Release Funds**  
*Defendant GGW Direct, GGW Brands, GGW Events Motion To Release Funds Or In The Alternative To Disburse Funds For Attorney Payment On Order Shortening Time*

12/24/2012 **Order of Remand from Federal Court**  
*Order Granting Wynn Las Vegas, LLC's Emergency Motion to Remand*

12/27/2012 **Opposition**  
*Opposition To Plaintiff's Motion For Summary Judgment On Its First Claim For Declaratory Relief; Declaration Of Chris Dale; Declaration Of Angela Pope*

12/28/2012 **Opposition to Motion For Summary Judgment**  
*Defendant Joseph Francis' Opposition To Plaintiff's Motion For Judgment On Its First Claim For Declaratory Relief*

12/28/2012 **Joinder To Motion**  
Ecoff Blut, LLP's Joinder to Defendants GGW Direct, LLC, GGW Brands, LLC and GGW Events, LLC's Motion to Release Funds or in the Alternative to Disburse Funds for Attorney Payment on Order Shortening Time

01/03/2013 **Motion**  
Motion to Adjudicate the Rights of Counsel to Enforce Attorney's Lien and for Judgment for Attorney's Fees on Order Shortening Time

01/03/2013 **Notice of Hearing**  
Notice of Hearing on Motion to Adjudicate the Rights of Counsel to Enforce Attorney's Lien and for Judgment for Attorney's Fees on Order Shortening Time

01/04/2013 **Reply**  
Reply in Support of Plaintiff's Motion for Summary Judgment on its First Claim For Declaratory Relief

01/04/2013 **Objection**  
Objections to the Declaration of David J. Otto, Esq.

01/04/2013 **Objection**  
Objections to the Declaration of Angela Pope

01/04/2013 **Objection**  
Objections to the Declaration of Chris Dale

01/04/2013 **Opposition to Motion**  
Wynn Las Vegas LLC's Opposition to Motion to Release Funds or in the Alternative to Disburse Funds for Attorney Payment

01/04/2013 **Notice**  
Notice of Defendant Blue Horse Trading, LLC's Failure to Oppose Motion for Summary Judgment

01/07/2013 **Opposition**  
Opposition To Motion To Adjudicate Rights Of Counsel To Enforce Attorney's Lien And For Judgment For Attorney's Fees

01/08/2013 **Motion for Summary Judgment** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
Plaintiff's Motion for Summary Judgment (Rescheduled)

01/08/2013 **Motion to Release Funds** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
Defendant GGW Direct, GGW Brands, GGW Events Motion To Release Funds Or In The Alternative To Disburse Funds For Attorney Payment On Order Shortening Time

01/08/2013 **Joinder** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
Ecoff Blut, LLP's Joinder to Defendants GGW Direct, LLC, GGW Brands, LLC and GGW Events, LLC's Motion to Release Funds or in the Alternative to Disburse Funds for Attorney Payment on Order Shortening Time

01/08/2013 **Motion** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
Defendants' Motion to Adjudicate the Rights of Counsel to Enforce Attorney's Lien and for Judgment for Attorney's Fees on Order Shortening Time

01/08/2013 **All Pending Motions** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
Parties Present  
Minutes  
Result: Matter Heard

01/08/2013 **Notice of Motion**  
Notice Of Motion Of Motion To Redact And File Under Seal Exhibits To And Portions Of Plaintiff's Motion For Summary Judgment On Its First Claim For Declaratory Relief

01/10/2013 **Amended Certificate of Service**  
Amended Certificate Of Service Of Notice Of Motion Of Motion To Redact And File Under Seal Exhibits To And Portions Of Plaintiff's Motion For Summary Judgment On Its First Claim For Declaratory Relief

01/16/2013 **Business Court Order**  
First Amended Business Court Scheduling Order and Order Setting Civil Bench Trial and Calendar Call

01/28/2013 **Order Denying Motion**  
Order Denying: (1) Plaintiff's Motion For Summary Judgment; (2) Defendant GGW Direct, GGW Brands, GGW Events Motion To Release Funds Or In The Alternative To Disburse Funds For Attorney Payment On Order Shortening Time And Defendants' Motion To Adjudicate The Rights Of Counsel To Enforce Attorney's Lien; And (3) Motion To Adjudicate The Rights Of Counsel To Enforce Attorney's Lien And For Judgment For Attomeys Fees On Order Shortening Time

01/28/2013 **Notice of Entry of Order**  
Notice of Entry of Order Denying: (1) Plaintiff's Motion for Summary Judgment; (2) Defendant GGW Direct, GGW Brands, GGW Events Motion to Release Funds or in the Alternative to Disburse Funds for Attorney Payment on Order Shortening Time and Defendants' Motion to Adjudicate the Rights of Counsel to Enforce Attorney's Lien; and (3) Motion to Adjudicate the Rights of Counsel to Enforce Attorney's Lien and for Judgment for Attomeys Fees on Order Shortening Time

02/07/2013 **Telephonic Conference** (3:30 PM) (Judicial Officer Gonzalez, Elizabeth)  
Parties Present  
Minutes  
Result: Matter Heard

02/15/2013 **Motion to Seal/Redact Records** (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
Notice Of Motion Of Motion To Redact And File Under Seal Exhibits To And Portions Of Plaintiff's Motion For Summary Judgment On Its First Claim For Declaratory Relief  
Minutes  
Result: Granted

02/21/2013 **Motion to Withdraw As Counsel**  
Notice of Motion on Order Shortening Time (1) Motion to Withdraw as Counsel for Defendants GGW Direct, LLC; GGW Brands, LLC; and GGW Brands, LLC for Failure to Pay Attorneys' Fees and Costs; and Serious Conflict With Client

02/21/2013 **Transcript of Proceedings**  
Transcript Of Proceedings Hearing Of Motions

02/26/2013 **Order Granting Motion**  
Order Granting Motion to Redact and File Under Seal Exhibits and Portions of Plaintiff's Motion for Summary Judgment on Its First Claim for Declaratory Relief

02/26/2013 **Stipulation and Order**  
Stipulation and Order to Amend Stipulation and Protective Order

02/27/2013 **Motion for Sanctions**  
*Plaintiffs Motion For Terminating Sanctions, Issues Sanctions Or Other Appropriate Relief For The GGW Entities' Manager's Failure To Appear At Deposition In Violation Of Court Instructions, On Order Shortening Time*

02/28/2013 **Motion to Withdraw as Counsel** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Notice of Motion on Order Shortening Time (1) Motion to Withdraw as Counsel for Defendants GGW Direct, LLC; GGW Brands, LLC; and GGW Brands, LLC for Failure to Pay Attorneys' Fees and Costs; and Serious Conflict With Client*  
Parties Present  
Minutes  
Result: Granted

02/28/2013 **Notice of Entry of Order**  
*Notice Of Entry Of Order Granting Motion To Redact And File Under Seal Exhibits And Portions Of Plaintiff's Motion For Summary Judgment On Its First Claim For Declaratory Relief*

02/28/2013 **Notice of Entry of Stipulation and Order**  
*Notice Of Entry Of Stipulation And Order To Amend Stipulation And Protective Order*

03/21/2013 **CANCELED Motion** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Vacated - per Judge*  
*Plaintiffs Motion For Terminating Sanctions, Issues Sanctions Or Other Appropriate Relief For The GGW Entities' Manager's Failure To Appear At Deposition In Violation Of Court Instructions, On Order Shortening Time*

03/25/2013 **Motion**  
*Motion for Modification of Injunction on Order Shortening Time*

04/26/2013 **Motion** (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Motion for Modification of Injunction on Order Shortening Time*

05/23/2013 **CANCELED Status Check** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Vacated - Case Closed*

05/30/2013 **Status Check** (8:30 AM) (Judicial Officer Gonzalez, Elizabeth)

06/20/2013 **Calendar Call** (9:15 AM) (Judicial Officer Gonzalez, Elizabeth)

06/24/2013 **Bench Trial** (1:30 PM) (Judicial Officer Gonzalez, Elizabeth)

07/25/2013 **CANCELED Calendar Call** (9:15 AM) (Judicial Officer Gonzalez, Elizabeth)  
*Vacated - Case Closed*

07/29/2013 **CANCELED Bench Trial** (1:30 PM) (Judicial Officer Gonzalez, Elizabeth)  
*Vacated - Case Closed*

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**FINANCIAL INFORMATION**

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	<b>Defendant Blue Horse Trading LLC</b>		
	Total Financial Assessment		1,483.00
	Total Payments and Credits		1,483.00
	<b>Balance Due as of 03/26/2013</b>		<b>0.00</b>
06/05/2012	Transaction Assessment		1,483.00
06/05/2012	Wiznet	Receipt # 2012-70431-CCCLK	Blue Horse Trading LLC (1,483.00)
	<b>Defendant David R Houston Ltd</b>		
	Total Financial Assessment		30.00
	Total Payments and Credits		30.00
	<b>Balance Due as of 03/26/2013</b>		<b>0.00</b>
05/09/2012	Transaction Assessment		30.00
05/09/2012	Wiznet	Receipt # 2012-60214-CCCLK	David R Houston Ltd (30.00)
	<b>Defendant Francis, Joseph R</b>		
	Total Financial Assessment		1,483.00
	Total Payments and Credits		1,483.00
	<b>Balance Due as of 03/26/2013</b>		<b>0.00</b>
06/05/2012	Transaction Assessment		1,483.00
06/05/2012	Wiznet	Receipt # 2012-70430-CCCLK	Francis, Joseph R (1,483.00)
	<b>Defendant GGW Brands LLC</b>		
	Total Financial Assessment		33.50
	Total Payments and Credits		33.50
	<b>Balance Due as of 03/26/2013</b>		<b>0.00</b>
05/11/2012	Transaction Assessment		30.00
05/11/2012	Wiznet	Receipt # 2012-61196-CCCLK	GGW Brands LLC (30.00)
12/27/2012	Transaction Assessment		3.50
12/27/2012	Wiznet	Receipt # 2012-157587-CCCLK	GGW Brands LLC (3.50)

<b>Defendant GGW Direct LLC</b>			
Total Financial Assessment			1,497.00
Total Payments and Credits			1,497.00
<b>Balance Due as of 03/26/2013</b>			<b>0.00</b>
05/11/2012	Transaction Assessment		1,483.00
05/11/2012	Wiznet	Receipt # 2012-61195-CCCLK	GGW Direct LLC
12/05/2012	Transaction Assessment		(1,483.00)
12/05/2012	Wiznet	Receipt # 2012-148930-CCCLK	GGW Direct LLC
12/24/2012	Transaction Assessment		3.50
12/24/2012	Wiznet	Receipt # 2012-156946-CCCLK	GGW Direct LLC
01/07/2013	Transaction Assessment		(3.50)
01/07/2013	Wiznet	Receipt # 2013-01729-CCCLK	GGW Direct LLC
02/21/2013	Transaction Assessment		3.50
02/21/2013	Wiznet	Receipt # 2013-22083-CCCLK	GGW Direct LLC
			(3.50)

<b>Defendant GGW Events LLC</b>			
Total Financial Assessment			1,483.00
Total Payments and Credits			1,483.00
<b>Balance Due as of 03/26/2013</b>			<b>0.00</b>
06/05/2012	Transaction Assessment		1,483.00
06/05/2012	Wiznet	Receipt # 2012-70432-CCCLK	GGW Events LLC
			(1,483.00)

<b>Defendant Houston, David R</b>			
Total Financial Assessment			1,483.00
Total Payments and Credits			1,483.00
<b>Balance Due as of 03/26/2013</b>			<b>0.00</b>
05/09/2012	Transaction Assessment		1,483.00
05/09/2012	Wiznet	Receipt # 2012-60213-CCCLK	Houston, David R
			(1,483.00)

<b>Plaintiff Wynn Las Vegas LLC</b>			
Total Financial Assessment			1,730.00
Total Payments and Credits			1,730.00
<b>Balance Due as of 03/26/2013</b>			<b>0.00</b>
04/18/2012	Transaction Assessment		1,530.00
04/18/2012	Payment (Window)	Receipt # 2012-50310-CCCLK	Brownstein Hyatt Farber Schreck
11/16/2012	Transaction Assessment		(1,530.00)
11/16/2012	Wiznet	Receipt # 2012-142069-CCCLK	Wynn Las Vegas LLC
			200.00
			(200.00)



**PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 21700 Oxnard Street, Suite 1750, Woodland Hills CA 91367

The foregoing documents NOTICE OF REMOVAL will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On \_\_\_\_\_, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

**II. SERVED BY U.S. MAIL**

On March 26, 2013, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. *Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.*

Attorneys for Wynn Las Vegas, LLC d/b/a Wynn Las Vegas  
 Mitchell J. Langberg, Esq.  
 Laura E. Bielinski, Esq.  
 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
 100 North City Parkway, Suite 1600  
 Las Vegas, Nevada 89106

Attorney for Wynn Las Vegas  
 Malhar S. Pagay  
 Pachulski Stang Ziehl & Jones LLP  
 10100 Santa Monica Blvd., 13th Floor  
 Los Angeles, California 90067-4003

**III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL** (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, \_\_\_\_\_, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. *Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

March 26, 2013

Tatyana Menachian

Date

Type Name

Signature

